

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: § MISC. CASE NO. \_\_\_\_\_  
NONJUDICIAL CIVIL FORFEITURE §  
PROCEEDING INVOLVING A 2020 §  
BENTLEY FLYING SPUR SEDAN §  
VIN ENDING IN \*1627 §

AGREED MOTION TO EXTEND TIME  
UNDER 18 U.S.C. § 983(a)(3)(A)

The United States, by the United States Attorney for the Southern District of Texas, as authorized by 18 U.S.C. § 983(a)(3)(A), moves the Court to extend the time in which the United States is required to file a complaint for forfeiture and/or to obtain an indictment alleging forfeiture from March 31, 2023 to September 29, 2023.

The United States represents to the Court as follows:

1. On or Around October 5, 2022, agents with the United States Drug Enforcement Administration (“DEA”), executed a federal search warrant at a residence located at 9234 Fox Bend Ln, Missouri City, TX 77459. That location was the residence of Paul Ward. As part of that search DEA agents seized a 2020 Bentley Flying Spur Sedan with a Vehicle Identification Number (“VIN”) ending in \*1627 (the “property”).
2. Following the seizure, DEA initiated administrative forfeiture proceedings against the property. All of the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to be sent by DEA to interested parties has been sent.
3. The time has expired for any person to file a claim to the property under 18

U.S.C. § 983(a)(2)(A)-(E).

4. On or around December 31, 2022, Paul Ward (hereinafter “claimant”) filed a claim with DEA in a nonjudicial civil forfeiture proceeding against the property. Claimant asserted an interest in the property.

5. Upon the filing of the claim, the DEA transmitted the claim to the United States Attorney for the purpose of initiating a judicial forfeiture action against the property.

6. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the property and/or to obtain an indictment alleging that the property is subject to forfeiture no later than March 31, 2023.

7. However, the United States and the claimant have reached an agreement under 18 U.S.C. § 983(a)(3)(A), to extend the 90-day deadline to file a complaint for forfeiture and/or to obtain an indictment alleging forfeiture. The parties intend to engage in settlement negotiations and feel that additional time should result in a settlement of the matter without further civil litigation. A proposed Order Extending Time is attached to this Motion.

Conclusion

Based upon the agreement of the Parties to extend the time, the United States respectfully requests that the Court extend the period in which the United States is required to file a complaint against the property and/or to obtain an indictment alleging that the property is subject to forfeiture up to and including September 29, 2023.

Respectfully submitted,

ALAMDAR S. HAMDANI  
United States Attorney  
Southern District of Texas

By: s/ Brandon L. Fyffe  
Brandon L. Fyffe  
Assistant U. S. Attorney  
SDTX ID No. 3698129  
1000 Louisiana, Ste. 2300  
Houston, Texas 77002  
Phone: 713.567.9331  
Fax: 713.718.3300

**CERTIFICATE OF CONFERENCE**

Carl Moore, Counsel for Claimant Paul Ward, has been contacted and agrees with the motion before the Court, extending the period in which the United States is required to file a complaint against the property and/or to obtain an indictment alleging that the property is subject to forfeiture up to and including September 29, 2023.

s/ Brandon L. Fyffe  
Brandon L. Fyffe  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following in the manner indicated on March 28, 2023:

Counsel for Claimant (via email)

Carl Moore  
2202 Ruth Street  
Houston, TX 77004  
[carl@qmlawfirm.com](mailto:carl@qmlawfirm.com)

s/ Brandon L. Fyffe  
Brandon L. Fyffe  
Assistant U.S. Attorney